



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SK/JMH
F. #2013R00948

*610 Federal Plaza
Central Islip, New York 11722*

October 9, 2019

By Hand and ECF

The Honorable Joseph F. Bianco
United States Circuit Judge
for the Court of Appeals, Second Circuit
100 Federal Plaza
Central Islip, New York 11722

Re: United States v. Philip A. Kenner and Tommy C. Constantine
Criminal Docket No. 13-607 (JFB)

Dear Judge Bianco:

The government respectfully submits this letter to request a brief extension—until October 14—of the deadline to file its sentencing memorandum in the above-captioned matter. The government received, yesterday, a 158-page supplemental sentencing submission from defendant Kenner, and expects to receive, today, a CD containing 349 exhibits related to the submission. The government is requesting this brief extension in order to address these filings in its response. The government has conferred with Kenner’s stand-by counsel and Constantine’s counsel, and both consent to this motion.

Respectfully submitted,

RICHARD P. DONOGHUE
United States Attorney

By: /s/
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cc: All counsel of record (via ECF)
Philip A. Kenner, defendant pro se (via certified mail)